

Exhibit B

(TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT -
EQUITABLE RELIEF - OTHER)

Received
1-27-25
11:05am
HQ

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

SUPERIOR COURT
CIVIL ACTION

NO.

James Wine, Jr. M.D., MPH, Plaintiff(s)

A TRUE COPY ATTEST

DEPUTY SHERIFF
Middlesex County

1/17/25

DATE OF SERVICE

President & Fellows of Harvard College, Defendant(s)
Harvard Medical School

SUMMONS

To the above-named Defendant:

You are hereby summoned and required to serve upon Sarah Milkovich, plaintiff's attorney, whose address is Libby Hepes Brooks + Milvey 260 Franklin St. Boston, MA 02110 an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Dedham either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

WITNESS, Michael D. Ricciuti, Esquire


, at _____ the _____

day of _____, in the year of our Lord two thousand and _____

Hester A. Lissuthy Clerk

NOTES:

1. This summons is issued pursuant to Rules 4 of the Massachusetts Rules of Civil Procedure.
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each such defendant, each should be addressed to the particular defendant.

CIVIL ACTION COVER SHEET		DOCKET NUMBER 2482CV01098	Massachusetts Trial Court Superior Court	2	
COUNTY		Norfolk Superior Court (Dedham)			
Plaintiff James D. Wines, Jr., M.D., M.P.H. ADDRESS: 7 Peterson Road Quincy, MA 02169			Defendant: President & Fellows of Harvard College d/b/a Harvard Medical School ADDRESS: 1033 Massachusetts Avenue, Suite 3 Cambridge, MA 02138-5366		
Plaintiff Attorney: Sarah Milkovich ADDRESS: 260 Franklin Street Boston, MA 02110 BBO: 705661			Defendant Attorney: ADDRESS: BBO:		
TYPE OF ACTION AND TRACK DESIGNATION (see instructions section on next page)					
CODE NO. E17	TYPE OF ACTION (specify) Civil Rights Act, contract, and related claims.	TRACK A	HAS A JURY CLAIM BEEN MADE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
*If "Other" please describe:					
<div style="display: flex; justify-content: space-around;"><div>Is there a claim under G.L. c. 93A? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</div><div>Is there a class action under Mass. R. Civ. P. 23? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</div></div> <p style="text-align: center;">STATEMENT OF DAMAGES REQUIRED BY G.L. c. 212, § 3A</p> <p>The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff's counsel relies to determine money damages. (Note to plaintiff: for this form, do not state double or treble damages; indicate single damages only.)</p> <p style="text-align: center;"><u>TORT CLAIMS</u></p> <p>A. Documented medical expenses to date</p> <div style="display: flex;"><div style="width: 80%;"><p>1. Total hospital expenses</p><p>2. Total doctor expenses</p><p>3. Total chiropractic expenses</p><p>4. Total physical therapy expenses</p><p>5. Total other expenses (describe below)</p><div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div></div><div style="width: 20%; border-left: 1px solid black; padding-left: 10px;"><p>Subtotal (1-5):</p><p style="text-align: right;">\$0.00</p></div></div> <p>B. Documented lost wages and compensation to date</p> <p>C. Documented property damages to date</p> <p>D. Reasonably anticipated future medical and hospital expenses</p> <p>E. Reasonably anticipated lost wages</p> <p>F. Other documented items of damages (describe below)</p> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">Please see filed Rule 29 Statement.</div> <div style="display: flex; justify-content: flex-end; margin-top: 10px;"><div style="border-top: 1px solid black; width: 60%;"></div><div style="border-top: 1px solid black; width: 40%; text-align: right;">TOTAL (A-F): \$0.00</div></div> <p>G. Briefly describe plaintiff's injury, including the nature and extent of the injury:</p> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">Please see filed Rule 29 Statement.</div>					
CONTRACT CLAIMS					
<input type="checkbox"/> This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement. Mass. R. Civ. P. 8.1(a).					
Item #	Detailed Description of Each Claim			Amount	
1.	Please see filed Rule 29 Statement.				
Total					
Signature of Attorney/Self-Represented Plaintiff: X /s/ Sarah Milkovich			Date: November 8, 2024		
RELATED ACTIONS: Please provide the case number, case name, and county of any related actions pending in the Superior Court.					
CERTIFICATION UNDER S.J.C. RULE 1:18(5)					
I hereby certify that I have complied with requirements of Rule 5 of Supreme Judicial Court Rule 1:18: Uniform Rules on Dispute Resolution, requiring that I inform my clients about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.					
Signature of Attorney: X /s/ Sarah Milkovich			Date: November 8, 2024		

Docketed 11/08/2024

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COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

SUPERIOR COURT DEPARTMENT OF
THE TRIAL COURT

JAMES WINES,

Plaintiff,

v.

PRESIDENT & FELLOWS OF HARVARD
COLLEGE d/b/a HARVARD MEDICAL SCHOOL

Defendant.

Civil Action No. 2482CV01098

PLAINTIFF'S STATEMENT PURSUANT TO RULE 29

NOW COME the plaintiff, James D. Wines, Jr., M.D., M.P.H., in the above-entitled action and hereby states that as a direct and proximate result of the defendant's breaches of contract; breaches of the implied covenant of good faith & fair dealing negligence; civil conspiracy; and violations of the United States Constitution, the Massachusetts Constitution, G.L. c. 12, §§ 11H–11J, 42 U.S.C. § 2000bb-1, and G.L. c. 93A, §§ 2, 11, Dr. Wines was caused to suffer financial, emotional, and reputational harms.

Specifically, Dr. Wines alleges that Defendant President & Fellows of Harvard College, doing business as its Harvard Medical School (“Defendant,” “Harvard,” or “HMS”), wrongfully and discriminatorily deprived Dr. Wines of his earned academic appointment to the HMS faculty as an Instructor of Psychiatry. Dr. Wines alleges that he was terminated by HMS on or around November 10, 2021, without cause, without notice, and as a result of discriminatory action taken

against Dr. Wines because of his sincerely held religious beliefs and medical conditions. Dr. Wines alleges that as a direct and proximate result of HMS's wrongful, discriminatory removal of Dr. Wines's academic appointment, Dr. Wines has suffered lost wages; lost benefits; costs related to survival without income from work; stress to Dr. Wines and his family; reputation harms; and the loss of potential future research, publication, grant, employment, and other professional opportunities.

In the event of recovery, the plaintiff believes, and therefore avers that recovery will be in excess of Fifty Thousand (\$50,000.00) Dollars.

The plaintiff reserves the right to introduce further evidence at the time of trial.

Respectfully submitted,

James D. Wines, Jr., M.D., M.P.H.,

By his Attorneys

Dated: November 8, 2024

/s/ Sarah M. Milkovich

Sarah M. Milkovich (BBO No. 705661)

Douglas S. Brooks (BBO No. 636697)

LIBBY HOOPES BROOKS & MULVEY, P.C.

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